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14 Attorneys for PLAINTIFF

15 ROBERT HUNTER BIDEN

16 **UNITED STATES DISTRICT COURT**

17 **CENTRAL DISTRICT OF CALIFORNIA**

18 **WESTERN DIVISION**

19 ROBERT HUNTER BIDEN, an  
individual,

20 Plaintiff,

21 vs.

22 PATRICK M. BYRNE, an individual,

23 Defendant.

Case No. 2:23-cv-09430-SVW-PD

**PLAINTIFF ROBERT HUNTER  
BIDEN'S REQUEST FOR  
COUNSEL TO APPEAR  
REMOTELY FOR FEBRUARY 24,  
2025 FINAL PRE-TRIAL  
CONFERENCE; DECLARATION  
OF BRYAN M. SULLIVAN**

*[Proposed] Order filed and served  
concurrently herewith]*

24 Date: February 24, 2025

25 Time: 1:30 P.M.

26 Ctrm.: 10A

27  
28 Judge: Hon. Stephen V. Wilson

5802142.1

**PLAINTIFF ROBERT HUNTER BIDEN'S REQUEST FOR COUNSEL TO APPEAR REMOTELY FOR  
FEBRUARY 24, 2025 STATUS CONFERENCE; DECLARATION OF BRYAN M. SULLIVAN**

18 | Dated: February 11, 2025

## EARLY SULLIVAN WRIGHT GIZER & MCRAE LLP

By: /s/ *Zachary C. Hansen*

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11 *Attorney for Plaintiff*  
12 Robert Hunter Biden

# DECLARATION OF BRYAN M. SULLIVAN

I, Bryan M. Sullivan, declare and state as follows:

1. I am counsel of record for Plaintiff Robert Hunter Biden (“Plaintiff”) in the above-entitled action and am over the age of 18. I hereby submit this declaration in support of Plaintiff’s Request for Counsel to Appear Remotely for February 24, 2025 Final Pre-Trial Conference. If called as a witness, I would and could testify to the matters contained herein.

8        2. I have been involved in all aspects of this case and will be trial counsel  
9 for this with my colleague Zachary Hansen, Esq., and my participation in the Final  
10 Pre-Trial Conference is, therefore, necessary.

11       3. I am unable to be in the State of California on February 24, 2025, I reside  
12 in Virginia and have family/child care obligations that week that prevent me from  
13 traveling to California and attending the Conference in person. However, my  
14 colleague, Mr. Hansen, who will be trial counsel on this case will be appearing in  
15 person for the Status Conference, so Plaintiff will have another attorney present for  
16 this hearing.

17 I declare under penalty of perjury under the laws of the United States of  
18 America that the foregoing is true and correct. Executed on this 11<sup>th</sup> of February,  
19 2025, at Roanoke, Virginia.

/s/ *Bryan M. Sullivan*

Bryan M. Sullivan